

1 PITE DUNCAN, LLP
STEVEN W. PITE (NV Bar #008226)
2 EDDIE R. JIMENEZ (NV Bar #10376)
JACQUE A. GRUBER (NV Bar #11385)
3 4375 Jutland Drive, Suite 200
P.O. Box 17933
4 San Diego, CA 92177-0933
Telephone: (702) 413-9692
5 Facsimile: (619) 590-1385
E-mail: ecfnvb@piteduncan.com

6 ABRAMS & TANKO, LLP
7 MICHELLE L. ABRAMS (NV Bar #005565)
3085 S. Jones Blvd., Suite C
8 Las Vegas, NV 89146

9 Attorneys for GMAC MORTGAGE, LLC

10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF NEVADA

12
13 In re
14 HUGO AVILA,
15 Debtor(s).

Bankruptcy Case No. BK-S-09-26228-mkn
Chapter 13
GMAC MORTGAGE, LLCS REQUEST
FOR SPECIAL NOTICE AND SERVICE
OF PAPERS AND RESERVATION OF
RIGHTS

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17
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19 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL
20 INTERESTED PARTIES

21 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC
22 Mortgage, LLC hereby requests special notice of all events relevant to the above-referenced
23 bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced
24 bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule
25 2002, the commencement of any adversary proceedings, the filing of any requests for hearing,
26 objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters
27 which must be noticed to creditors, creditors committees and parties-in-interest and other notices as
28 required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-

1 referenced bankruptcy court.

2 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master
3 Mailing List in this case, the following address be used:

4 JACQUE A. GRUBER
5 PITE DUNCAN, LLP
6 4375 Jutland Drive, Suite 200
7 P.O. Box 17933
8 San Diego, CA 92177-0933

9 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
10 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
11 waiver of the within party's:

12 a. Right to have any and all final orders in any and all non-core matters entered only
13 after de novo review by a United States District Court Judge;

14 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,
15 whether or not the same be designated legal or private rights, or in any case, controversy or
16 proceeding related hereto, notwithstanding the designation or not of such matters as "core
17 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant
18 to statute or the United States Constitution;

19 c. Right to have the reference of this matter withdrawn by the United States District
20 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

21 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
22 which this party is entitled under any agreements at law or in equity or under the United States
23 Constitution.

24 All of the above rights are expressly reserved and preserved by this party without
25 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
26 or by any other participation in these matters.

27 Dated: September 18, 2009

28 /s/ Jacque A. Gruber
4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, CA 92177-0933
(702) 413-9692
NV Bar #11385
Attorney for GMAC MORTGAGE, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on September 18, 2009. Service was accomplished by the method and to the following as indicated:
BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

Hugo Avila
1865 Hallwood Drive
Las Vegas, NV 89119

Rodney K. Okano
2400 So Cimarron Rd., Ste #130
Las Vegas, NV 89117

Rick A. Yarnall
701 Bridger Ave., #820
Las Vegas, NV 89101

U.S. Trustee
Department of Justice
300 Las Vegas Boulevard, So.
Suite 4300
Las Vegas, NV 89101

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on September 18, 2009, at San Diego, California.

/s/ Marissa Telle